

Florida Walgreens Opioid Litigation Documents – Red Flags for Diversion

Summary: Walgreens filled opioid prescriptions in Florida under circumstances showing red flags for opioid diversion, i.e. prescription opioids obtained or used illegally. Suspicious orders at Walgreens distribution centers and retail pharmacies should have warranted further investigation and due diligence.

Select Documents of Relevance

Document Title: Percentage of Red-Flagged Prescriptions Resolved By Year

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=mpmh0257>

Date: 2020

Description: Bar graph with percentages of Walgreens' red-flagged prescriptions resolved from 2006 to 2020.

Document Title: Red Flags: Resolvable or Unresolvable?

OIDA ID: <https://www.idl.ucsf.edu/opioids/docs/#id=hpmh0257>

Date: 2022

Description: Walgreens internal training presentation addressing potential “red flags” and what actions to take if a potential red flag is identified.

Document Title: Six-Month Maximum Monthly Limit (Florida) : Total Flagged Walgreens Shipments: 6,347,349 (84.7%)

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=mlmh0257>

Date: 2014

Description: This document for Six-Month Maximum Monthly Limit (Florida) contains a table of Walgreens' flagged shipments from 2002 to 2014 and a bar graph of MME (morphine milligram equivalent) within or over threshold.

Document Title: Internal Audit Report : DEA Compliance - Perrysburg Distribution Center

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=yqmh0257>

Date: 2008-12

Description: Walgreens internal audit report addressing improvements required for compliance with DEA regulations pertinent to all company distribution centers and specific to the Perrysburg location.

Document Title: Re: Questions about Fla board holding rph's liable for excessive c2 rx's

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=symh0257>

Date: 2010-07

Description: A Walgreens Pharmacy Manager asks Sujit Raval, District Pharmacy Supervisor, how to protect licenses if pharmacists are held responsible for excessive dispensing of CII [Schedule II] prescriptions. Raval responds, "use your professional judgement and take care of the patients."

Document Title: Re: High Quantity Stores 682971

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=yxmh0257>

Date: 2011-01

Description: Kristine Atwell, CII Function Manager at Jupiter Plaza, brings attention to several stores that are ordering large quantities of a drug on a regular basis and asks how to check validity of the orders. Barbara Martin, Manager of Rx Inventory Drug Stores, replies "I have no idea where these stores are getting this type of volume."

Document Title: Market Action Plan/Guidelines for CII Dispensing

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=zxmh0257>

Date: 2011-10

Description: Various email threads about filling CII prescriptions, including questions about acceptable forms of ID, home addresses of patients, comments regarding specific physicians, pharmacist safety concerns, and best practices.

Document Title: Fw: Orlando Loss of Controlled Substances

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=kkmh0257>

Date: 2012-02

Description: Divisional Vice President Rex Swords sends David Lovejoy a draft email to review regarding an internal investigation due to an employee arrested for trafficking in controlled substances.

Document Title: FW: Coupons for Target Drugs Update

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=ynmh0257>

Date: 2016-04

Description: An email to District Managers states that, per the DEA, "controlled substance coupons with high discounts downloaded from the internet are considered a red flag" and lists three target drugs. Walgreens Health Care Supervisor Douglas Healy brings up concerns from pharmacists about similar coupons for other controlled drugs and asks if there is any discussion to expand the coupon restriction.

Document Title: State of Florida v. Walgreens Co. trial transcript - Day 13, Part 02

OIDA ID: <https://idl.ucsf.edu/opioids/docs/#id=tzlh0257>

Date: 2022-05

Description: Matthew Dunagan, who worked at Florida’s Office of Drug Control and the Attorney General office, answers questions regarding diversion and “pill mills” in Florida. Cami Caldwell shares her daughter’s experience with opioid use disorder and concern that her local Walgreens didn’t flag her prescriptions due to age, dosage, and duration.

OIDA Identification Numbers for Additional Relevant Documents

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| ▪ mqmh0257 | ▪ slmh0257 | ▪ kqmh0257 |
| ▪ mmmh0257 | ▪ xlmh0257 | ▪ hxmh0257 |
| ▪ ljmh0257 | ▪ hkmh0257 | ▪ gxmh0257 |
| ▪ lqmh0257 | ▪ gpmh0257 | ▪ rlmh0257 |
| ▪ jnmh0257 | ▪ mpmh0257 | |